REMARKS:

No amendment has been made to the claims. Claim 25 is the only independent claim pending.

In the Office Action, the Examiner maintained his position that Wells teaches "the viewer" and "the registration control" recited in claim 25. The Examiner indicated that the terms "a user" and "a controller" appear in Wells.

Claim language should be construed based on the meaning attached to the language and the context in which the language is recited. Claim 25 is directed to "a mobile communication terminal". Given that, Applicants seriously question how the mobile communication terminal could comprise a human being. The Examiner's construction of the term "viewer" totally ignores the claim context and therefore cannot be accepted.

Also, Applicants do not merely recite the term "controller" but recite a controller configured to perform specific functionality. According to the Examiner's reasoning, any prior art references in which the term "controller" appears can be used as prior art against the claim, regardless of how the controller functions in the references. Applicants do not believe that the Examiner has discharged his duty by just pointing out a term in the reference which happens to be the same term as recited in the claim. Applicants believe that the Examiner's job is to find prior references which disclose or teach the specific functionality recited in the claim.

Claim Rejection Under 35 U.S.C. 103(a)

In the Office Action which has been made final, claims 25, 28-30, 33, 34, 38, 39, 41-48, 84 and 85 are rejected under 35 U.S.C. 103(a) as being unpatentable over Wells et al (US 5,870,683) in view of Nishino (US 6,233,452). Applicants submit that Wells and Nishimo, either alone or combined, do not disclose or teach all of the limitations recited in the pending claims.

Wells does not disclose or teach receiving of screen data from an external source.

The Examiner's reliance on Wells is misplaced because Wells does not receive screen data from an external source. The SUMMARY OF THE INVENTION of Wells describes this operation as "input a definition of a graphical information sequence from an external source for storage in the mobile station." (col. 2, lines 31-33). The same language is found in the Abstract. Wells receives a definition of a graphical information sequence from an external source. The definition of a graphical information sequence is not an image.

In Wells, the memory 24 stores at least one Current Animation Array (CAA) 24. The CAA contains data for defining and controlling the operation of a Graphical Information Sequence (GIS). (col. 3, lines 60-63). Please note that Wells defines a "GIS" as an "animation" in the specification. (col. 3, lines 63-64). Thus, an "animation" as defined in Wells means a sequence and does not mean picture or image data itself. Put in another way, an "animation" as defined in Wells means a sequence which dictates how "frames", "scenes" or "images" are to be displayed. (col. 3, lines 65-67).

Other sections of the specification support the construction that an "animation" as defined in Wells means a sequence and does not mean picture or image data. For instance, the table located in the lower end of column 5 over to column 6 shows the parameters which define an animation. Significantly, none of the parameters in the table represents image data. See "Animation frames are displayed in "ping-pong" mode (instead of an animation loop, e.g. loop: frame 1-2-3-4-1-2 . . . ping-pong: 1-2-3-4-3-2 . . ." (col. 6, lines 5-11).

In another place of the specification, Wells states that <u>information describing a GIS</u> (or animation) may be prestored in the mobile station 10 during manufacture, may be subsequently loaded through an external data connection 28. (col. 4, lines 5-7). Wells further explains that <u>a data structure defining a given animation sequence</u> can be provided by the manufacture and that animation (or

sequence) can be loaded through the external data connection 28. (col. 10, lines 10-15).

Throughout the specification, Wells' focus is so placed on how to move images on the screen that it does not even mention where image data is stored in the mobile station. Applicants believe that in Wells, image data is prestored in the mobile station and that the mobile station receives a sequence or an instruction from an external source as to how to sequence those images. A user will get bored if he is shown the same image over time. The present invention solves the problem by renewing stored images. Wells, however, solves the problem by moving the prestored images.

Wells does not disclose or teach the viewer.

Claim 25 recites a viewer that activates the network browsing functionality to selectively access information provider servers located in the second network and receive one or more blocks of screen data from the accessed information provider servers for preview of the received one or more blocks of screen data by a user of the mobile communication terminal. The viewer gives a user the ability to review screen data directly from a second network and the ability to eventually select one or more screen data among the reviewed screen data. In other words, the viewer gives a user an option to selectively receive screen data after reviewing screen data from the second network.

On the other hand, Wells discloses that the definition of an animation sequence can be loaded from the network 32 through the RF link by Over the Air Programming or by Short Message Services messages. (col. 10, lines 11-19). The Over the Air Programming is a service used to install or rewrite a program in mobile stations. The Short Message Service is a service under which push-type information is sent down. It is clear that these services have nothing to do with the viewer as recited in claim 25.

In relation to the viewer limitation, the Examiner quoted the language "selectively display" from the Abstract of Wells. Please note that in the present invention, "selectively register" and "selectively display" are different operations. In the present invention, screen data is selectively registered from the second network. Thereafter, the registered screen data is selectively correlated to a standby state for display. Thus, "selectively display" is a discrete step and comes after "selectively register".

In relation further to the limitation, the Examiner quoted the language "be erased and replaced with the same or different characters" from col. 4, lines 47-53 of Wells. This quotation is totally misplaced. The language in the complete sentence reads, "the presently displayed characters can simply be erased and replaced with the same or different characters written to a new location." Thereby, both horizontal and vertical scrolling can be accomplished. (col. 3, lines 51-53). The language has no bearing on the viewer limitation. It describes one of the animations, i.e., how displayed characters are scrolled on the screen.

Wells does not disclose or teach the registration control.

Claim 25 further recites a registration control that upon a selection by the user of one block of screen data through the preview of the received one or more blocks of screen data, stores the selected one block of screen data in one of multiple memory areas each correlatable to any one of the at least one standby state. The registration control gives a user the ability to selectively register screen data among the previewed screen data.

There is nothing in Wells that discloses or teaches the registration control. Wells simply states that the definition of an animation sequence can be loaded or stored from a telephone network. In other words, in Wells, a definition received by a user is automatically registered. In Wells, users are given absolutely no ability to selectively register definitions. In relation to the registration control limitation, the

Examiner again quoted the language "selectively display" from the Abstract of Wells. As explained above, this quotation is misplaced.

Wells discloses that the definition of an animation sequence can be loaded from the network 32 through the RF link by Over the Air Programming or by Short Message Services messages. (col. 10, lines 11-19).   Using the Over the Air Programming service, users are given no ability to review programs before installation of the program.   In fact, users are given no option but to install the program.   The same is true for the Short Message Service.   Under the Short Message Service, users are given absolutely no option but to receive a message. Under the service, users are given no ability to selectively resister messages, because "receiving a message" under the service is equivalent to "storing or registering the message" without selection.

Wells, even if combined with Nishino, still fails to teach claim 15.

All Nishino teaches is that a wireless terminal can have an Internet access capability.   If the Examiner could extend his imagination to visualize the Wells phone with the Intent access capability of Nishino, it will be realized that such a phone would not be even nearly close to the mobile communication terminal recited in claim 25.   First of all, Wells only teaches loading of the definition of an animation sequence, not loading of a picture or image.   Therefore, Wells and Nishino, even if combined, only teach access of Internet sites for loading the definitions of animation sequences.
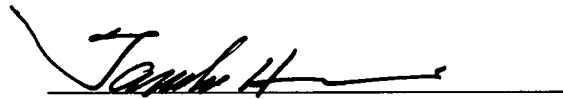
More importantly, Nishino does not disclose or teach the registration control recited in claim 25.   There is nothing in Nishino that discloses or teaches how data downloaded from the Internet can be selectively registered.   Since neither Wells nor Nishino discloses or teaches the registration control recited in claim 25, Wells and Nishino even if combined still fail to disclose all of the limitations of claim 25. Therefore, claim 25 is patentable over Wells and Nishino.

Again, if the Examiner could visualize the Wells phone with the Internet access capability of Nishino, it is to be realized how important a role the registration control plays in implementing the present invention. Since lacking the ability to selectively register screen data among the previewed screen data, such a phone must store each and every screen data it accesses on the Internet. Such a phone would be so impractical that no one would like to use it.

As explained, claim 25 should be patentable over Wells and Nishino because neither discloses the registration control. Since claim 25 should be patentable, the dependent claims should also be allowable.

Respectfully submitted,

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